

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

AMENDMENT TO REGISTRATION STATEMENT

Pursuant to the Foreign Agents
Registration Act of 1938, as amended.

1. Name of Registrant Ruder & Finn, Inc.	2. Registration No. 1481
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3. This amendment is filed to accomplish the following indicated purpose or purposes:

- ☐ To correct a deficiency in
☐ Initial Statement
☐ Supplemental Statement for _____
☐ To give notice of change in an exhibit previously filed.
- ☐ To give a 10-day notice of a change in information as required by Section 2(b) of the Act.
☒ Other purpose (specify) To add The Government of Spain, The Foreign Ministry as a client of Ruder & Finn, Inc.

4. If this amendment requires the filing of a document or documents, please list -

EXHIBIT A - Attached
EXHIBIT B - AttachedShort Form Registration Statement For:
Francisco Moreno

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. If more space is needed, full size insert sheets may be used.

Please add The Government of Spain - The Foreign Ministry as a client of Ruder & Finn, Inc. -- per attached exhibits A & B.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this amendment and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief.

(Both copies of this amendment shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Marvin D. Frankel

President, R & F International

Subscribed and sworn to before me at New York, N.Y.this 31st day of January, 19 77Josephine L. Colon
(Notary or other officer)

My commission expires

JOSEPHINE L. COLON
Notary Public, State of New York
No. 31-0714870 Qual. in N.Y. Co.
Commission Expires March 30, 1977

EXHIBIT A

TO REGISTRATION STATEMENT

Under the Foreign Agents Registration Act of 1938, as amended

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant Ruder & Finn, Inc. 110 East 59th Street, New York, N. Y. 10022		2. Registration No. 1481
3. Name of foreign principal The Government of Spain - The Foreign Ministry	4. Principal address of foreign principal The Ministry of Foreign Affairs, Placio de Santa Cruz, Madrid, Spain	

5. Indicate whether your foreign principal is one of the following type:

☒ Foreign government

☐ Foreign political party

☐ Foreign or ☐ domestic organization: If either, check one of the following:

☐ Partnership

☐ Committee

☐ Corporation

☐ Voluntary group

☐ Association

☐ Other (specify) _____

☐ Individual - State his nationality _____

6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant.

The Foreign Ministry

b) Name and title of official with whom registrant deals.

Javier Ruperez, Executive Assistant to Foreign Minister

7. If the foreign principal is a foreign political party, state:

a) Principal address

NOT APPLICABLE

b) Name and title of official with whom the registrant deals.

c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

NOT APPLICABLE

TERMINATED

DATE 12-31-77

b) Is this foreign principal

NOT APPLICABLE

Owned by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

Directed by a foreign government, foreign political party, or other foreign principal . . . Yes ☐ No ☐

Controlled by a foreign government, foreign political party, or other foreign principal . . Yes ☐ No ☐

Financed by a foreign government, foreign political party, or other foreign principal . . . Yes ☐ No ☐

Subsidized in whole by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

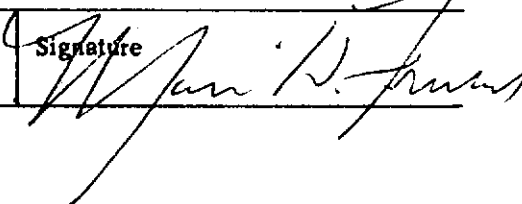
Subsidized in part by a foreign government, foreign political party, or other foreign principal Yes ☐ No ☐

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

NOT APPLICABLE

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

NOT APPLICABLE

Date of Exhibit A January 31, 1977	Name and Title Marvin Frankel, Pres., R & F International	Signature 
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EXHIBIT B

TO REGISTRATION STATEMENT
Under the Foreign Agents Registration Act
of 1938, as amended

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant	Name of Foreign Principal
Ruder & Finn, Inc.	The Government of Spain - The Foreign Ministry

Check Appropriate Boxes:

1. ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.

2. ☐ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.

3. ☒ The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

Fee \$10,000 a month plus an additional \$2,083 per month for the services of Prof. Francisco Moreno as a consultant to Ruder & Finn. Contract may be cancelled by either party upon 30 days notice. Any out-of-pocket expenses incurred by Ruder & Finn in carrying out the terms of the contract are to be paid by the Spanish Govt. Such costs include travel, telephone, telexes, postage, meetings with editors, etc. We are pre-filing and expect to have a written contract within one week. The Govt. of Spain has already deposited in Ruder & Finn's account an advance of \$25,000. We have just begun our work for The Government of Spain.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

Ruder & Finn will seek to establish in newspapers, magazines and on television a greater understanding in the U.S. for the policies of the current Spanish Government.

TERMINATED

DATE 12-10-72

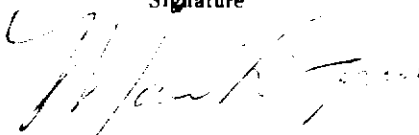
5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Ruder & Finn will seek to publicize the work and policies of the present Spanish Government. Specifically, we will seek to send journalists to Spain to interview key personalities in the Government, develop articles on Spain for U.S. publications, assist in arrangements for having the Prime Minister meet with leading government figures in the U.S. and to carry out ancillary projects in regard to these meetings such as press conferences, interviews with newspapers, magazines and television and meetings with opinion and business leaders. It is also possible that Ruder & Finn will work on developing an arts project with a major U.S. museum with treasures from Spanish museums. In addition, we will also be assisting Spanish television producers in how to use their media more effectively. Ruder & Finn will also be meeting with selected universities in an attempt to develop platforms for speeches and/or receptions for key members of the Spanish Government. Finally, we will also be advising the Spanish Government on press coverage in the U.S. and possible meetings with representatives of business and government who may be interested in developments in Spain.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?^{1/} Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

SEE ABOVE

Date of Exhibit B	Name and Title	Signature
January 31, 1977	Marvin Frankel, Pres. Ruder & Finn International	

^{1/} Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.